

Plaintiff,  
PAMELA MOSES  
Pro SE

RECEIVED

2012 SEP 10 PM 4:30

THOMAS M. GOULD  
CLERK, U.S. DISTRICT COURT  
W.D. OF TN MEMPHIS

U. S. District Court  
Western District

**PAMELA MOSES**

Plaintiff,

v.

City of Collerville  
Pier One Imports Inc., STEPHANIE  
DILDAY and Jane Doe, Jon Doe,  
Buisness License #200937 DOES 1- 43,  
Inclusive

Defendants.

CASE NO. 2:12cv-02441-jfm-dkv

**COMPLAINT FOR DAMAGES FROM  
VICARIOUS LIABILITY,  
HARRASSMENT, DEFAMATION,  
FALSE IMPRISONMENT, MALICIOUS  
PROSECUTION, EMOTIONAL  
DISTRESS, AND DISCRIMINATION;  
AND FOR PUNITIVE DAMAGES**

**DEMAND FOR JURY TRIAL**

**Motion To Bring In A Third Party**

Comes now the plaintiff, Pamela Moses, by and through herself pro se in the above entitled cause, respectfully request leave to serve the City of Collierville and Mayor Stan Joyner Jr. name them as a defendant in the entitled cause.

Will accept jurisdiction of this complaint.

- (a) Will issue service of process upon all the defendants with deliberate speed.
- (b) Award reasonable attorney fees to the plaintiff.
- (c) Plaintiff hereby demand a jury trial on all trialable issues.
- (d) Allow plaintiff to further amend complaint upon identity of real Jon & Jane Doe(s).

- (e) Award Plaintiff punitive damages in the amount of \$1,000,000 (one million dollars) against the defendants
- (f) Award plaintiff compensatory damages in the amount of \$500,000 (five hundred thousand dollars) against the defendants.
- (g) Award cost of this action to the plaintiff.
- (h) Award such other and further relief as this Court may deem appropriate.

Grounds for this motion are as follows:

1. Defendants knowingly committed the above torts during the occurrence on
2. Defendants took plaintiffs life & liberty away.

#### **JURISDICTION**

1. This complaint is brought pursuant to Rule 14 (a) also permits plaintiffs to sue persons joined as third- party defendants, provided that the claim arises out of the same transaction or occurrence as original claim against defendant. The basis for jurisdiction in this action is therefore proper pursuant to civil rules & procedure. Case law **Thomas v. Barton Lodge II, Ltd., 174 F.3d 636.**

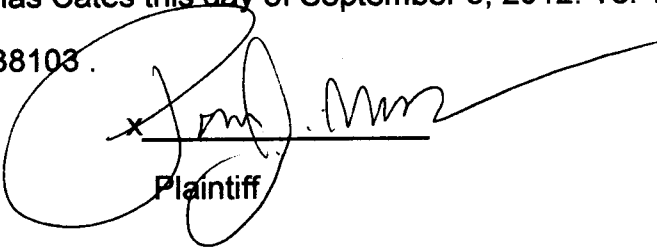
Wherefore, Plaintiff now moves the court to add third party defendants to the official complaint and amended complaint previously filed on 5/03/2012 with this court on in which the following relief was requested  
08/31/2012

Respectfully submitted,

Pamela Moses

### **Certificate of Service**

I declare under penalty of perjury and certify that a true and exact copy of the forgoing is true and correct pursuant to 28 U. S. C. 1746 has been mailed to the city of Collerville attorney Thomas Cates this day of September 8, 2012. To: 130 North Court Ave Memphis TN 38103 .

A handwritten signature in black ink, appearing to be "J. M. Cates", is written over a horizontal line. The signature is enclosed within a large, hand-drawn oval. To the left of the signature, there is a small "x" mark.

Plaintiff